

State of Vermont
Department of Environmental Conservation
Waste Management & Prevention Division
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michael.nahmias@vermont.gov

AGENCY OF NATURAL RESOURCES

January 19, 2017

Mr. David Gauthier
Vantem Panels
74 Glen Orne Drive
Brattleboro, VT 05301

RE: Diesel Fuel Release, 74 Glen Orne Dr. Brattleboro, VT, SMS Site #2013-4372

Dear Mr. Gauthier,

The Sites Management Section (SMS) of the Vermont Department of Environmental Conservation (DEC) has reviewed the “*Aboveground Storage Tank (AST) Assessment*” performed by Environmental Compliance Services, Inc. (ECS) in February 2013. The assessment was performed in response to the discovery of a hole in a 275-gallon AST containing off-road, dyed diesel fuel. Black and orange staining was observed on the concrete building foundation adjacent to the AST and pink and black stained soils were observed beneath the AST location. The AST was removed from the site and ECS performed a soil excavation to remove contaminated soils and determine the extent of the contamination. ECS and a subcontractor removed 10 by 3 feet of surface soils and proceeded to dig down to 4 feet below the former AST. According to the report, five (5) 55-gallon drums of contaminated soils were generated during excavation activities and stored onsite. The property has been added to the State’s Active Hazardous Waste Site List as site number 2013-4372.

Soil samples collected from the sidewalls and bottom of the excavation indicated the vertical extent of the release was not defined. A photo-ionization detector (PID) was utilized to screen soils for total organic vapors (TOVs). ECS reported PID readings ranging from 14.3 to 18.7 parts per million (ppm) in soils screened from the sidewalls of the excavation and a reading of 233.4 ppm at the bottom of the excavation. These readings are greater than the 10 ppm threshold value which triggers further investigation in diesel-impacted soils. ECS collected soil samples for laboratory analysis of volatile organic compounds (VOCs) and Total Petroleum Hydrocarbons (TPH). Two samples were collected from the sidewalls and one sample from the bottom of the excavation. For VOCs, all three samples had concentrations of VOCs greater than the laboratory detection limits, however all of the concentrations reported were less than the EPA regional screening values. TPH was reported at 159 mg/kg in the east sidewall, 1,390 mg/kg in the excavation bottom, and 1,780 mg/kg in the west sidewall. ECS indicated that further excavation of contaminated soils could possibly impact the building’s foundation.

Based on the observed conditions reported in the ECS AST Assessment Report and summarized above, the SMS is requesting the following:

- **Provide documentation regarding the disposal of the 5 drums of petroleum-contaminated waste.**
- **File a Notice to the Brattleboro Town Land Records.** The Notice describes the contamination that remains in-place at depth and indicates the AST release location on a site plan. Typically, the SMS prepares the Notice and provides it to the property owner for filing with the Town Clerk.

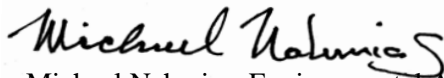
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Please note, the SMS is not requesting further investigation. The removal of the surficial contamination upon discovery of the release has eliminated the direct-contact pathway satisfactorily. Once documentation regarding the disposal of the 5 drums of petroleum-contaminated waste is received, the SMS will prepare the Notice to the Land Records for the release location. Vantem Panels will have to file the Notice with the Brattleboro Town Clerk, requesting a copy of the Notice with the Town Clerk's stamp indicating the book and page number, date, time, and Clerk's signature. There is typically a \$10 per page filing fee to complete the filing. Once the SMS has been provided with the stamped copy of the Notice, the property will be removed from the State's Active Hazardous Waste Site List and a Site Management Activities Complete (SMAC) letter will be issued for the property.

My contact information including phone number and email address are provided at the top of this letter. Please do not hesitate to reach out with any questions or concerns. I look forward to working with you to resolve this matter.

Sincerely,

A handwritten signature in black ink that reads "Michael Nahmias". The signature is fluid and cursive, with a large, stylized "S" at the end.

Michael Nahmias, Environmental Analyst
Sites Management Section

c: Alicia Flammia, ATC Group Services (formerly ECS) – *via e-mail*